

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

BRENNAN M. GILMORE,	:	Case No. 3:18-cv-00017
Plaintiff,	:	
v.	:	
ALEXANDER E. JONES, et al.	:	
Defendants	:	
<i>In re subpoena to non-party journalist Jessica Bidgood</i>	:	
	:	

**[PROPOSED] ORDER GRANTING
OBJECTIONS AND MOTION TO QUASH SUBPOENA TO VERIZON FOR THE
MOBILE PHONE RECORDS OF JOURNALIST JESSICA BIDGOOD**

This matter is before the Court on the Objections and Motion to Quash Subpoena to Verizon for the Mobile Phone Records of Journalist Jessica Bidgood (“Bidgood’s Motion”) and on the Stipulation of Bidgood and Defendant James Hoft requesting that the Court grant Bidgood’s Motion.

Based on all the files, records, and proceedings herein, **IT IS HEREBY ORDERED** that:

1. Bidgood’s Motion is **GRANTED**;
2. Defendant Hoft shall place the CD/DVD he received from Verizon containing Bidgood’s phone records into a sealed receptacle and send it to Bidgood’s counsel, Charles D. Tobin, via FedEx overnight delivery;
3. Defendant Hoft shall delete all copies (including electronic copies) that he has made of Bidgood’s files from the Verizon CD/DVD; and

4. Within three business days after entry of this Order, Defendant Hoft shall file with this Court a declaration, signed under penalty of perjury, that he has complied with this Order.

Date: _____, 2021

Honorable Joel Hoppe
United States Magistrate Judge
U.S. District Court, Western District of Virginia